

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION
4 BOZA PLEASANT-BEY,)
5 Plaintiff,)
6 VS.)
7 STATE OF TENNESSEE, et al,)
8 Defendants.)
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1 S T I P U L A T I O N

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4 The deposition of Chris Brun, taken on behalf
5 of the plaintiff, remotely via Zoom, by agreement of
6 parties, on April 8, 2021, for all purposes allowed
7 under the Federal Rules of Civil Procedure.

8 It is agreed that Carole K. Briggs, licensed
9 court reporter for the State of Tennessee, may swear the
10 witness, take his deposition, and afterwards reduce same
11 to typewritten form, and that the reading and signing of
12 the completed deposition by the witness is not waived.

13 All formalities as to notice, caption,
14 certificate, et cetera, are expressly waived. All
15 objections, except as to the form of the question, are
16 reserved to the hearing.

17

18 (Unless previously provided, all names are spelled
19 phonetically, to the best of the court reporter's
20 ability.)

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1 (Whereupon, the foregoing deposition
2 began at 1:35 p.m.)

3 Whereupon,

4 CHRIS BRUN,

5 having been first duly sworn, was examined and deposed
6 as follows:

7 EXAMINATION BY MS. MAPLES:

8 Q. Could you state your name for the record,
9 please.

10 A. Chris Brun.

11 Q. What is your job title?

12 A. I am the contract monitor of operations at
13 Trousdale.

14 Q. And how long have you been in that position?

15 A. Since the facility opened.

16 Q. And when was that?

17 A. 2016.

18 Q. What month of 2016?

19 A. January.

20 Q. And what are the job responsibilities of the
21 contract monitor of operations?

22 A. Overseeing the prison as far as anything
23 related to inmate activities where their rights might be
24 limited. Like segregating inmates, doing disciplinary
25 hearings, when their custody level is raised or lowered.

1 And then I'm on call 24 hours a day. Any time there are
2 critical incidents, if we have to have a calculated use
3 of force or house someone in restrictive housing, I
4 approve those functions for the State.

5 Q. What does an average day look like for you at
6 Trousdale?

7 A. I normally work Monday through Friday, but I
8 will come in every once in a while on a weekend day, or
9 I might come in on an evening. But normally, I would
10 come in in the morning and review any use-of-force
11 incidents or any assaults, any critical thing that may
12 have happened the day before or the weekend before. And
13 I'll review our TOMIS system to make sure that
14 everything that happened throughout the weekend that's a
15 critical incident gets entered into our system.

16 And then normally around 9:00 a.m. is when I
17 go into the facility and will just do a walk-through of
18 a couple of different housing units. Go into
19 restrictive housing, because I do oversee the
20 disciplinary process. So our disciplinary board
21 typically conducts their high priority cases, their
22 Class A hearings in restrictive housing. And then I
23 sign off on our restrictive housing lock-up packets,
24 called movement confinement packets.

25 And after doing those lock-up packets and

1 disciplinary hearings, I will do a walk-through of at
2 least one of our restrictive housing pods. Typically
3 walk through at least one other area a day. It might be
4 medical or central control or our program building.

5 I try to get back up into the office around
6 12:30 or 1:00. And that's when I will do all of my
7 paperwork. We have a weekly report that we do of our
8 activities. And if we have inmate sentence credits or
9 re-class hearings that I have to review and approve, at
10 that point, I will do the remainder of my paperwork at
11 the end of the day.

12 Q. Do you go to meetings?

13 A. I do.

14 Q. Who do you typically have meetings with over
15 the course of a week?

16 A. My supervisor and the other contract monitors
17 of operations will typically meet once a month. And
18 we'll meet with the facility ADO staff at least weekly.

19 Q. What does ADO for?

20 A. Basically, it's assignment duty officer. So
21 it would be anybody that's at a chief level or higher.

22 Q. Do you meet with the warden?

23 A. I do.

24 Q. Who is the current warden of Trousdale?

25 A. Right now we have somebody just in an acting

1 capacity.

2 Q. Where is Warden Raymond Byrd?

3 A. He's not at the facility right now. It would
4 be the associate warden of security AW Upton is filling
5 in.

6 Q. Is Warden Raymond Byrd on some sort of leave
7 right now?

8 A. I believe there's going to be a new warden at
9 the facility in the near future.

10 Q. So Warden Byrd is on leave right now?

11 A. Either that or reassignment.

12 Q. How long has he been absent from the
13 facility?

14 A. At least a few weeks.

15 Q. More than two?

16 A. I believe so.

17 Q. Do you know why he is being reassigned and/or
18 is on a current leave of absence?

19 A. No, I don't.

20 Q. Have you heard any rumors about why he is
21 being reassigned?

22 A. I've heard rumors, but that's all that is.

23 Q. What rumors have you heard?

24 A. Just that ultimately the facility, CoreCivic
25 and TDOC, just wanted a change of wardens, which is not

1 uncommon.

2 Q. Why would CoreCivic want a change of wardens?

3 A. I don't know that. That's just -- like I
4 said, that's something that's been said throughout the
5 facility.

6 Q. What is the rumor about why CoreCivic wants a
7 change of wardens?

8 A. Just that there have been some use-of-force
9 incidents that have occurred that have been reviewed.

10 Q. Have there been allegations that Warden Byrd
11 has encouraged CoreCivic employees to use perhaps
12 greater amounts of force than the previous warden
13 administration?

14 A. I've not heard that, no.

15 Q. What use-of-force incidents are you referring
16 to?

17 MR. WELBORN: Object to the form.

18 THE WITNESS: What was that?

19 BY MS. MAPLES:

20 Q. What use-of-force incidents are you referring
21 to?

22 MR. WELBORN: Same objection.

23 MS. HASHEMIAN: You can answer.

24 THE WITNESS: Oh, there was a use of force
25 from, I want to say a couple of months ago, specifically

1 that --

2 BY MS. MAPLES:

3 Q. What month?

4 A. I don't know. It was around a couple of
5 months ago.

6 Q. Can you describe that incident?

7 A. It was an incident with an inmate who had
8 assaulted staff and was refusing directives to come out
9 of his cell.

10 Q. What kind of force was used on that inmate?

11 A. Chemical agents and --

12 Q. And what does that mean?

13 A. It's an inflammatory agent that is used to
14 get an inmate to comply with directives when they're
15 being defiant.

16 Q. By inflammatory agent, do you mean like a
17 pepper spray?

18 A. Yes.

19 Q. And I think we talked over each other for a
20 second. You said an inflammatory agent and -- and I
21 think I cut you off. What were you going to say after
22 the and?

23 A. Bean bag round.

24 Q. What are bean bag rounds?

25 A. They're non-lethal bean bags that can be

1 deployed.

2 Q. When you say deployed, do you mean propelled
3 from some kind of device?

4 A. Yes.

5 Q. When you say deployed, do you mean propelled
6 from some kind of device at a high rate of speed in such
7 a way that it might cause pain?

8 A. I mean deployed from a non-lethal object.

9 Q. That is not my question. My question is when
10 you say deployed, do you mean bean bags propelled from
11 some type of device that are propelled in such a way and
12 at such a speed that it causes physical pain to the
13 inmate upon contact?

14 A. The purpose of it is to comply with
15 directives. And when it is deployed, it can cause pain
16 to require somebody to comply with directives.

17 Q. Okay, so the rumor is that Warden Byrd is
18 currently MIA at the facility because an inmate refused
19 to exit his cell and CoreCivic employees pepper sprayed
20 him and shot him with bean bag rounds; is that right?

21 MR. WELBORN: Object to the form.

22 MS. HASHEMIAN: Object to the form. You can
23 answer.

24 THE WITNESS: That was an incident that
25 occurred that TDOC reviewed prior to him being put on

1 leave --

2 BY MS. MAPLES:

3 Q. And the rumor is that -- could you repeat
4 that, I didn't hear you.

5 A. I said that is the incident that occurred
6 prior to him being put on leave or reassigned away from
7 the facility.

8 Q. And the rumor is that there is some kind of
9 causation there, that the incident caused him to be
10 placed on leave or reassigned?

11 A. That's -- the incident occurred and he was.
12 So I mean, that's the rumor. But there's no facts
13 behind that.

14 Q. Well, there may be facts, right, you just
15 don't know?

16 A. Correct.

17 Q. Were you a part of reviewing that use-of-
18 force incident?

19 A. Yes, I was.

20 Q. Did TDOC determine that that was an accepted
21 use of force?

22 A. We determined there were compliance issues
23 with it.

24 Q. Did TDOC determine that there was an
25 excessive use of force in that incident?

1 A. No.

2 Q. What were the compliance issues?

3 A. Getting prior authorization for using the
4 bean bag system.

5 Q. Have there been other incidents where
6 CoreCivic employees at Trousdale have used certain
7 security equipment without prior authorization?

8 A. I know that's happened before throughout the
9 five-and-a-half-years the facility has been open.

10 Q. So you all have an acting warden right now
11 pending Warden Byrd's replacement?

12 A. Yes, we have an acting warden at the
13 facility.

14 Q. Have any other CoreCivic executives visited
15 the facility recently?

16 A. Yes, they have.

17 Q. Which ones?

18 A. The ones I know would be Vice President
19 Medlin and Managing Director Keeton.

20 Q. And why were they in the facility?

21 A. I don't know.

22 Q. Did you meet with them?

23 A. I've talked to them in passing, but I have
24 not had a specific meeting with them, no.

25 Q. When were they in the facility?

1 A. Earlier today.

2 Q. Have there been any rumors about why they're
3 there today?

4 A. No.

5 Q. Do you send e-mails back and forth with
6 CoreCivic employees as part of your job at Trousdale?

7 A. Yes, I do send e-mails to CoreCivic staff.

8 Q. How often?

9 A. Routinely.

10 Q. Every day?

11 A. Normally, yes, at least once a day.

12 Q. Which CoreCivic employees do you correspond
13 with the most?

14 A. The ADO staff.

15 Q. Give me the names of the people you are
16 talking about when you say ADO staff.

17 A. Right now it would be AW Vantell, AW Hans, AW
18 Wattwood, and the two chiefs, McCloud and Thomas.

19 Q. The two chiefs of what? What is their full
20 title?

21 A. Security and unit management.

22 Q. What do you correspond with them about?

23 A. It could be a number of different things.

24 Q. Do you correspond with them about violent
25 incidents that have taken place at the facility?

1 A. Yes, we would.

2 Q. Do you correspond with them about any
3 staffing issues?

4 A. Not in a meeting setting. I mean, we do --
5 we have an instrument that we review for that.

6 MS. MAPLES: Apologies everyone. My
7 conference call line just shut off.

8 BY MS. MAPLES:

9 Q. I'm sorry, Mr. Brun, I think I didn't hear
10 the rest of your answer. Can you finish that up for me?

11 A. What was the question?

12 Q. I don't remember.

13 MS. MAPLES: Court reporter, can you read it
14 back.

15 (Whereupon, the court reporter read the
16 question and answer.)

17 BY MS. MAPLES:

18 Q. Okay, I'll ask another question then. Do you
19 correspond with the ADO staff about staffing levels via
20 e-mail?

21 A. Only for critical post coverage.

22 Q. How often do you correspond with them about
23 critical post coverage?

24 A. Monday through Friday.

25 Q. How many units does Trousdale have?

1 A. Seven.

2 Q. And what are those units called?

3 A. Buildings. They're called buildings.

4 They're W Building, Bravo Building -- it's a building.

5 Q. Right, what I'm asking is what are the titles
6 for each one of them?

7 A. Okay. W, D, F, C, B, E and A.

8 Q. And how many pods are there?

9 A. W has five, D has three, C has three, F has
10 three, B has three, E has three, A has five.

11 Q. What is the capacity at Trousdale?

12 A. 2,672 is the bed capacity.

13 Q. How many inmates are there currently?

14 A. Around 2250.

15 Q. Is that fewer inmates than Trousdale has had
16 in the past?

17 A. It is.

18 Q. Why does Trousdale currently have fewer
19 inmates than Trousdale has had in the past?

20 A. With Covid, we went a long time not getting
21 any inmates. So as inmates expired throughout the
22 state, no new ones kept flowing in.

23 Q. Are you involved with the grievance process
24 at Trousdale at all?

25 A. I'm not.

1 Q. Do you ever speak to inmates in the course of
2 your daily walks around the facility?

3 A. I do.

4 Q. Are you familiar with Mr. Pleasant-Bey?

5 A. Yes, I am.

6 Q. And how do you know Mr. Pleasant-Bey?

7 A. I believe that he's one of our intake workers
8 that is in that area of the compound. That's where I've
9 seen him.

10 Q. Have you ever spoken to him about the
11 grievance process?

12 A. Not that I can recall.

13 Q. Are you aware that Mr. Pleasant Bay has filed
14 grievances?

15 A. No, I'm not.

16 Q. Do you ever review inmate grievances?

17 A. No, I do not.

18 Q. Do inmates ever come to you with certain
19 complaints about things that are occurring within the
20 facility?

21 A. Yes, they have.

22 Q. What are some examples of things inmates have
23 approached you about?

24 A. It could be something like the cable is
25 fuzzy. My sink is clogged. I have a union supply

1 package in intake. I mean, it's a variety of different
2 things.

3 Q. Have inmates ever approached you and told you
4 that they were in fear for their safety?

5 A. I've had inmates say that throughout being at
6 the prison.

7 Q. Do you have a role in making protective
8 custody decisions at Trousdale?

9 A. I'm the final person that would review the PC
10 outcome with the hearing process, so yes.

11 Q. Has Trousdale had inmates in protective
12 custody that have been attacked?

13 A. There has at least been one case that I'm
14 aware of.

15 Q. Has Trousdale had situations in which an
16 individual was denied protective custody, but then
17 attacked?

18 A. I don't recall.

19 Q. Do you know what a noncompliance report is?

20 A. I do.

21 Q. Do you ever draft them?

22 A. I have.

23 Q. What are the areas for which you might draft
24 a noncompliance report?

25 A. There are several different. I mean, it

1 could be a count process that's wrong or a disciplinary.
2 It could be security equipment. It could be a number of
3 different things.

4 Q. Okay, so security equipment. What about use
5 of force?

6 A. Yes, that's one of our instruments.

7 Q. What about segregation procedures?

8 A. Yes, that's also one of our instruments.

9 Q. What about the count?

10 A. Yeah, that was one of the examples I gave.

11 Q. Oh, okay. What about cell searches?

12 A. Yes.

13 Q. Drug testing?

14 A. Yes.

15 Q. What are some others?

16 A. Records and reports. There's a medical
17 instrument. Behavioral health.

18 Q. Is there anything else?

19 A. Classification. Jobs.

20 Q. Sentence credit?

21 A. That's not an instrument. We don't have an
22 instrument called sentence credits, no.

23 Q. What is the instrument that you do have that
24 might involve sentence credits?

25 A. We have a classification instrument that

1 involves dealing with inmates' institutional files. And
2 then we have a records instrument.

3 Q. Who is your direct supervisor?

4 A. John Fisher.

5 Q. What about Carolyn Jordan?

6 A. No.

7 Q. John Fisher, how often do you speak to John
8 Fisher?

9 A. At least three times a week, if not more.

10 Q. When you talk to John, do you ever just give
11 him an opinion on how things are going at the prison?

12 A. I've given him my opinion on areas I've
13 looked at throughout the day.

14 Q. So is there a situation where you've said, I
15 looked at use of force today and CoreCivic was doing a
16 bad job?

17 A. No, I've never said that.

18 Q. So what kind of opinion might you express?

19 A. If there is a specific item where they were
20 not compliant with that standard, I would advise there
21 is a specific part of the instrument that they need to
22 improve on.

23 Q. When you submit a noncompliance report, is
24 CoreCivic required to submit a corrective action plan?

25 A. They are.

1 Q. Do you ever offer suggestions about what
2 might go into the corrective action plan?

3 A. No, I don't.

4 Q. Do you ever opine that the corrective action
5 plan may not be adequate to fix the area of
6 noncompliance?

7 A. No, I don't.

8 Q. Do you offer feedback about how the
9 corrective action plan might be going?

10 A. I follow up with the audit the next quarter.
11 So I would provide them feedback if they were
12 noncompliant with that standard during my next review.

13 Q. So in terms of corrective action plan, you
14 basically just write it down?

15 A. Yes, I do. Well, I write down the finding
16 that I have.

17 Q. Right, okay. Well, who at TDOC, if anyone,
18 makes a judgment as to the sufficiency or, you know,
19 success of a corrective action plan?

20 A. I mean, we remeasure it during our next
21 audit, but -- and then if they are still noncompliant,
22 they have basically a new area they have to fill out as
23 to why the corrective action plan didn't work and what
24 they're going to do differently. So we do that when
25 it's a repeat finding.

1 Q. Well, I guess what I'm trying to figure out
2 is in situations where there have been years of repeat
3 noncompliant findings, does anyone at CoreCivic ever get
4 more involved and say, you need to take a greater amount
5 of action or a different action because this just isn't
6 working?

7 MS. HASHEMIAN: Object to the form.

8 MR. WELBORN: Same objection.

9 BY MS. MAPLES:

10 Q. You can answer.

11 A. If they do, I'm not aware.

12 Q. Has anyone at TDOC ever approached the
13 contract monitors at Trousdale and indicated that the
14 understaffing issue needs to be a priority?

15 MR. WELBORN: Object to the form.

16 MS. HASHEMIAN: Object to the form. You can
17 answer.

18 THE WITNESS: We advise CoreCivic monthly,
19 that's something we look at. So we advise them every
20 month where they're at compared to the previous month.

21 BY MS. MAPLES:

22 Q. I guess what I'm trying to figure out is not
23 what you as a contract monitor tell CoreCivic, but what
24 your supervisors and higher-ups at TDOC are telling you
25 about CoreCivic and what they need to be doing

1 concerning staff?

2 MS. HASHEMIAN: Object to the form. You can
3 answer.

4 THE WITNESS: I don't get any feedback from
5 anybody above me on how their staffing levels are going.

6 BY MS. MAPLES:

7 Q. Do you get any feedback from above you at
8 TDOC on anything that is occurring at Trousdale?

9 A. On occasion, yeah.

10 Q. Okay, give me an example.

11 A. Something like visitation, we're starting
12 that up this weekend. So like my supervisor got with
13 the upper management and I to discuss how we're going to
14 do visitation this weekend. That would be an example.

15 Q. So that's kind of a specific policy
16 directive. I'm speaking more to the conditions at
17 Trousdale generally. Has anyone at TDOC ever said to
18 you that some action needs to be taken or some change
19 needs to be made there to change conditions at the
20 prison?

21 MS. HASHEMIAN: Object to the form.

22 MR. WELBORN: Object to the form.

23 MS. HASHEMIAN: You can answer.

24 THE WITNESS: No, they have not.

25 BY MS. MAPLES:

1 Q. Can company noncompliance reports rise to the
2 level of liquidated damages?

3 A. They can.

4 Q. Are you aware of situations in which they
5 have?

6 A. I am.

7 Q. Okay, so I am going to put a document on your
8 screen in just a second, if you'll bear with me. Mr.
9 Brun, do see that in front of you, you have a document
10 with the Bates stamp at the top left-hand corner, TDOC
11 003387?

12 A. Yes, I see that.

13 Q. And do you see that it's dated May 11th,
14 2017?

15 A. I do.

16 Q. Do you see that the subject is notice of
17 breach and immediate assessment of liquidated damages,
18 Trousdale Turner Correctional Center?

19 A. Yes, I see that.

20 Q. And if you, at any point, want to request
21 control of the screen so you can scroll on your own, you
22 are welcome to do that. Or if you want me to move up or
23 down the document, I am happy to do that for you. Just
24 let me know, okay?

25 MS. HASHEMIAN: Hey, Janna, I don't think

1 that's what you put into the chat. It looks like it's,
2 what's in the chat is a performance audit report from
3 the comptroller.

4 MS. MAPLES: Okay, give me just a second
5 then. Well, the performance audit report I sent at
6 12:48. I just sent 81 at 2:14. Do you see it?

7 MS. HASHEMIAN: Okay, when I look at it, the
8 only thing I see is potential Exhibit 2.

9 MS. MAPLES: You should see potential Exhibit
10 81. I'll put it in there again. Does anybody else have
11 a problem seeing it?

12 MS. POLLY: I only see potential Exhibit 2
13 also.

14 MR. WELBORN: Same here.

15 MS. MAPLES: Okay, give me just a sec.

16 (Off-the-record discussion.)

17 (Exhibit 1 was marked.)

18 BY MS. MAPLES:

19 Q. Okay, Mr. Brun, I'm going to scroll down here
20 to the second page. Do you see that in the recipient
21 list, you are included?

22 A. I do.

23 Q. Do you typically receive these letters
24 notifying individuals of assessments of liquidated
25 damages concerning Trousdale?

1 A. I do.

2 Q. Okay, now, you'll notice that this document
3 that we're going to mark as Exhibit 1 to your deposition
4 isn't just the two pages in the May 17th notice of
5 breach and assessment of liquidated damages. There are
6 a number of them. So what I've done is I've put them
7 all together for ease of reference, given that we're on
8 a Zoom. So I'm going to continue to go through and
9 we're just going to look at each one, okay?

10 A. Okay.

11 MS. HASHEMIAN: Janna, I still don't have the
12 e-mail.

13 MS. MAPLES: I sent it. It should be coming
14 through.

15 (Off-the-record discussion.)

16 BY MS. MAPLES:

17 Q. Mr. Brun, do you see that the second
18 assessment of liquidated damages is dated January 16th
19 of 2018 and has a Bates stamp TDOC 003363 at the top
20 left-hand corner?

21 A. I do.

22 Q. And do you see that this one, if we look at
23 the first paragraph, is for failure to man critical
24 posts and failure to fill vacancies within 45 days?

25 A. Yes.

1 Q. Do you that see the third document in this
2 collective Exhibit 1 is Bates stamped TDOC 00378 in the
3 top left-hand corner and dated March 26th of 2018?

4 A. Yes.

5 Q. Do you see that the fourth document in
6 collective Exhibit 1 is TDOC 00 -- oh, I think that's a
7 duplicate. Strike that.

8 Do you see that the fourth document in
9 collective Exhibit 1 is also dated March 26th of 2018
10 and has the Bates stamp at the top TDOC 003380?

11 A. Yes.

12 Q. And do you see that this one seems to be
13 concerning medical care?

14 A. Yes.

15 Q. Do you see that the next one has the Bates
16 stamp TDOC 003400 and the date June 28th, 2018?

17 A. Yes.

18 Q. And this one concerns staffing vacancies?

19 A. Yes.

20 Q. Do you see that the next one is dated August
21 17th of 2018 and has a Bates stamp at the top left-hand
22 corner TDOC 003405?

23 A. Yes.

24 Q. Do you see that the next one is Bates stamped
25 TDOC 003408 and it's dated September 18th of 2018?

1 A. Yes.

2 Q. Do you see that it also concerns staffing?

3 A. Yes.

4 Q. Do you see that the next one has a Bates
5 stamp TDOC 003366 and is dated January 18th of 2019?

6 A. Yes.

7 Q. Do you see that it concerns staffing again?

8 A. Yes.

9 Q. Do you see that the next is dated February
10 8th, 2019 and also concerns staffing?

11 A. Yes.

12 Q. Do you see that the next document is dated
13 June 19th of 2019?

14 A. Yes.

15 Q. Do you see that there is another one dated
16 April 16th of 2019 concerning behavioral health and
17 medical standards?

18 A. Yes.

19 Q. Do you see that there is another one,
20 September 8th of 2019 concerning failure to meet special
21 management inmate standards?

22 A. Yes.

23 Q. Special management inmates, what does that
24 mean?

25 A. Restrictive housing.

1 Q. Which inmates are placed in restrictive
2 housing?

3 A. Protective custody, pending protective
4 custody, punitive, pending hearing status and then
5 inmates that are at a higher level custody than what the
6 prison holds.

7 Q. Do you see on the second page of this
8 liquidated damages assessment there's also a failure to
9 meet security equipment standards and a failure to meet
10 grievance standards?

11 A. Yes.

12 Q. And do you see that there are failure to meet
13 behavioral health and medical standards?

14 A. Yes.

15 Q. Do you see that there are also failure to man
16 critical posts?

17 A. Yes.

18 Q. And failure to fill vacancies within 45 days?

19 A. Yes.

20 Q. Do you see that we have another liquidated
21 damages assessment dated November 21st of 2019?

22 A. Yes.

23 Q. Do you see that this one, again, concerns a
24 failure to meet special management inmates standards?

25 A. Yes.

1 Q. In what ways has CoreCivic failed to meet
2 special inmate standards here?

3 A. I mean, throughout the five-and-a-half years,
4 there's probably multiple different ways.

5 Q. Well, I just mean in this case, contract
6 monitoring instrument or Instruments 8B, 8C and 9B. Do
7 you know what those are offhand?

8 A. I don't. That instrument has several items.

9 Q. And do you see here, we've also got failure
10 to meet security equipment standards and account
11 standards?

12 A. Yes.

13 Q. And drug testing procedures and behavioral
14 health and medical standards?

15 A. Yes.

16 Q. And then on Page 4 of the November 21st, 2019
17 assessment of liquidated damages, do you see that there
18 are additional staffing errors?

19 A. Yes.

20 Q. Do you see that the next one is dated March
21 16 of 2020?

22 A. I do.

23 Q. Do you see that there is another one on June
24 3rd of 2020?

25 A. Yes, I do.

1 Q. Is that the last one that CoreCivic has
2 received, to your knowledge?

3 A. I don't recall. They may have received one
4 or two more after that.

5 Q. Have they received one recently?

6 A. Not in the last couple of months, no.

7 MS. MAPLES: Do you all want to take a quick
8 break?

9 MS. HASHEMIAN: Sure.

10 MR. WELBORN: Good with me.

11 (Recess observed.)

12 BY MS. MAPLES:

13 Q. Okay, Mr. Brun, do you remember that we
14 discussed earlier that one of the noncompliance reports
15 that you might issue would be pursuant to a monitoring
16 instrument for cell searches?

17 A. Yeah, the instrument itself is called
18 searches. And in the instrument, that's one of the
19 items we look at.

20 Q. I'm going to put a document on your screen
21 that is going to be Exhibit 2 to your deposition.

22 (Exhibit 2 was marked.)

23 BY MS. MAPLES:

24 Q. Do you see the document you have in front of
25 you?

1 A. I do.

2 Q. And what is this document?

3 A. That would be a noncompliance report.

4 Q. What is it concerning?

5 A. You will have to scroll down if you're
6 controlling it.

7 Q. Okay.

8 A. It's concerning conducting cell searches.

9 Q. Do you see that the date of this document is
10 April 20th of 2018?

11 A. I do.

12 Q. Do you see that there is an audit period
13 listed there?

14 A. I do.

15 Q. So is this an audit that you conduct
16 quarterly?

17 A. It is.

18 Q. And it looks like here, by virtue of it being
19 a noncompliance report, you have found that CoreCivic is
20 not in compliance with its requirements to conduct cell
21 searches?

22 MR. WELBORN: Object to the form.

23 MS. HASHEMIAN: You can answer.

24 THE WITNESS: Correct.

25 BY MS. MAPLES:

1 Q. Why is it important to conduct cell searches?

2 A. There's a few different reasons.

3 Q. Okay, what are they?

4 A. To make sure the cell is intact, the things
5 like the light and sink and outlets are functioning
6 appropriately. That the locking mechanism on the door
7 is working properly. And then the other piece is to
8 ensure that inmates are not hiding contraband in their
9 cell or bunk area.

10 Q. Does Trousdale have an issue with contraband?

11 A. They have contraband. I've been to a lot of
12 prisons throughout my career and every prison has
13 contraband.

14 MS. HASHEMIAN: Hey, Janna, I think you've
15 got the wrong document uploaded. It's -- you have cell
16 searches exhibit and it looks like what you have up open
17 is just cell searches.

18 MS. MAPLES: Excellent. Apologies.

19 BY MS. MAPLES:

20 Q. This document that begins with TDOC 001507 is
21 going to be Exhibit 2. The other document is exactly
22 the same. Mr. Brun, do you see that this document is
23 the same document we were just looking at, dated April
24 20th of 2018?

25 A. I do.

1 Q. So what were you saying? Did you say that
2 all facilities have an issue with contraband?

3 A. Every one I've been too, yeah.

4 Q. Do you, as the contract monitor, do anything
5 to assess the severity of issues like noncompliance with
6 cell searches?

7 A. I issue the findings and advise upper
8 management staff that this is an area that needs
9 improvement.

10 Q. Well, I guess what I'm trying to figure out
11 is, you know, you've said that every facility you've
12 ever encountered has had issues with contraband. So I'm
13 trying to figure out what you, as the contract monitor
14 for Trousdale, does to assign some kind of severity
15 rating to specific issues at Trousdale?

16 MR. WELBORN: Object to the form.

17 MS. HASHEMIAN: Object to the form. You can
18 answer.

19 THE WITNESS: We have some items that we
20 audit that are deemed essential and critical, and then
21 others that are not. So I mean, that's how we rate the
22 severity of the items.

23 BY MS. MAPLES:

24 Q. Well, I guess you're saying that for your
25 purposes, you know, you could be 60 percent in

1 compliance or 70 percent in compliance or 30 percent in
2 compliance and it doesn't really change your analysis at
3 all?

4 A. If it's a nonessential, if they're 95 percent
5 compliant, then they would be compliant. But anything
6 lower than that, like in this case they're 75 percent
7 compliant, so that would be a finding.

8 Q. Well, if they had been 40 percent compliant,
9 would that have changed your, you know, handling of this
10 noncompliance report?

11 MS. HASHEMIAN: Object to the form. You can
12 answer.

13 THE WITNESS: They would have had more
14 findings in the report.

15 BY MS. MAPLES:

16 Q. But it wouldn't have changed your activities
17 surrounding the report, it would only change the
18 findings?

19 A. Yes, it would just be a longer finding with
20 more cells that were noncompliant.

21 Q. Okay, so this one, like we said, is dated
22 April 20th of 2018. Let's scroll down. Do you see that
23 there is another one dated July 15th of 2019?

24 A. I do.

25 Q. And do you see that here the compliance

1 period is -- or excuse me, the audit period is January
2 through June of 2019?

3 A. Yes.

4 Q. So does it look like this is perhaps an audit
5 -- strike that. Do you see that the contract monitoring
6 instrument here is facility and property?

7 A. I do.

8 Q. Is that different than searches?

9 A. Yes, it's a different instrument, yeah.

10 Q. Okay, what is the difference?

11 A. One is dealing with overall inspections of
12 areas within the prison, including cleanliness and if
13 there is any excess property in the cells. The other
14 instrument is specifically dealing with cell searches
15 and being documented in our state system.

16 Q. And is this instrument, facility and
17 property, is it audited only biannually?

18 A. I believe so, yes.

19 Q. And do you see that under noncompliance issue
20 here on January 7th, 2019, it states: B Building had
21 multiple locks in the cell doors that appeared to be
22 tampered with?

23 A. Yes.

24 Q. Has Trousdale had other issues with locks in
25 the facility?

1 A. They have.

2 Q. During what time period has Trousdale had
3 issues with locks inside the facility?

4 A. With locks being tampered with, throughout
5 the prison outbreak.

6 Q. Well, let me phrase it this way: How often
7 does Trousdale have issues with locks inside the
8 facility not functioning properly?

9 A. Based on inmates putting things in the lock,
10 all throughout the prison outbreak.

11 Q. Do you see that here we have a noncompliance
12 report dated October 31st of 2019?

13 A. I do.

14 Q. And this one concerns searches?

15 A. Yes.

16 Q. And Searches Contract Monitoring Instrument 3
17 is considered essential; is that right?

18 A. Correct.

19 Q. And can you describe the noncompliance issue
20 that you found during this time period?

21 A. This is a standard where when inmates move to
22 a new cell, the cell needs to be searched and documented
23 in our state system. So they were moved into a new
24 cell, but the cell search was not conducted.

25 Q. And why wasn't it conducted?

1 A. I don't know. Or at least it was not
2 documented. It's possible the search was conducted, but
3 not put into the TOMIS system.

4 Q. And do you see that if we scroll down, there
5 is another noncompliance report dated December 31st of
6 2019?

7 A. I do.

8 Q. And it covers the time period from October
9 through December of 2019?

10 A. Correct.

11 Q. And it also involves Item 3 like the last
12 one. And you've noted in this report that it's a
13 repeat, right?

14 A. Yes.

15 Q. And can you describe the noncompliance issue
16 that was found?

17 A. It's the exact same as the last one. An
18 inmate being moved into a new cell and the search was
19 not documented in TOMIS.

20 Q. And why might that be dangerous?

21 A. I mean, a couple of different reasons like I
22 stated previously. It's a welfare check of the cell,
23 which would make sure that the area is functioning
24 appropriately, that the toilet is working, locks
25 working, lights are working. And then ultimately, it's

1 to ensure that there is no contraband in the cell area.

2 But again, it's possible that those cells were searched,
3 but just not documented in TOMIS.

4 Q. Do you see that we have a document that is
5 dated February 13th of 2020?

6 A. I do.

7 Q. And do you see that the audit scope covers
8 special management inmates from January of 2020 through
9 March of 2020?

10 A. I do.

11 Q. And do you see that under noncompliance Item
12 1, there is a discussion of the wrist band policy?

13 A. I do.

14 Q. And can you explain what that policy is?

15 A. Ultimately, every inmate in one of our
16 general population units needs to wear a band that
17 indicates where they're housed.

18 Q. And why is that?

19 A. To let staff know what unit that inmate lives
20 in.

21 Q. Why does staff need to be aware of the
22 inmate's unit?

23 A. So they know that the inmate is in the
24 appropriate housing unit, so we don't have offenders
25 from other units going to that unit.

1 Q. Does an inmate moving from one area of the
2 facility to an area in which that inmate is not
3 permitted pose a security threat?

4 MS. HASHEMIAN: Object to the form. You can
5 answer.

6 THE WITNESS: It could pose a security
7 threat.

8 BY MS. MAPLES:

9 Q. Has Trousdale had an incident or multiple
10 incidents in which inmates have been in an area of the
11 facility in which they are not permitted, and some type
12 of violent incident has occurred?

13 A. There have been incidents where inmates have
14 been in the wrong housing unit and some type of physical
15 altercation did occur.

16 Q. Have there been incidents in which inmates
17 from one unit have gone to another housing unit and
18 attacked an inmate?

19 A. Yes, that has occurred.

20 Q. Do you see that Noncompliance Item 2 involves
21 Special Management Inmate 12?

22 A. Yes.

23 Q. And do you see that it says all segregated
24 units, slash, pods shall be monitored on an irregular
25 basis at least every 30 minutes?

1 A. I do.

2 Q. And here, you found that there were
3 situations in which segregated units and pods were not
4 monitored on an irregular basis at least every 30
5 minutes, right?

6 MR. WELBORN: Object to the form.

7 MS. HASHEMIAN: You can answer.

8 THE WITNESS: That's correct. There -- but
9 this isn't just restrictive housing. As you can see, E
10 Unit is notated on here as well. And that's not a
11 restrictive housing unit.

12 BY MS. MAPLES:

13 Q. Oh, okay. So that was happening facility
14 wide, not just in the segregated units and pods?

15 MR. WELBORN: Object to the form.

16 THE WITNESS: There was one additional unit.

17 BY MS. MAPLES:

18 Q. Okay. Has CoreCivic had situations in which
19 an officer who was assigned to one pod or one unit was
20 not present and so officers from other units or pods had
21 to cover the oversight of the vacant pod or unit?

22 A. Yes, that's occurred.

23 Q. How often does that occur?

24 A. When a critical post is not filled. So it is
25 a common thing, at least once a day.

1 Q. Why is it important that these units and pods
2 be monitored every 30 minutes?

3 A. To do welfare checks on the inmates.

4 Q. If one critical post is unfilled and officers
5 from other pods or units have to pitch in to fill it, is
6 it more of a challenge to perform these security
7 monitoring checks every 30 minutes?

8 MS. HASHEMIAN: Object to the form.

9 THE WITNESS: It would be more work on that
10 officer, but it's definitely possible. Ultimately, it
11 would be two officers, typically, covering three pods.
12 So each officer would rotate doing security checks in
13 that third pod.

14 BY MS. MAPLES:

15 Q. You're saying it's possible, but yes, it
16 would be more challenging or more work, right?

17 A. Yes, it would be more work on that officer
18 because they would have to split the duties of a third
19 pod to check on.

20 Q. And do you see Noncompliance Item 3 concerns
21 inmates assigned to work in the segregation unit needing
22 maybe to be strip searched upon entering and exiting the
23 unit?

24 A. Yes.

25 Q. What is the noncompliance you found here?

1 A. That wasn't happening per this incident.

2 Q. Well, okay, so I'm talking about the specific
3 incident that you identified. Can you explain the
4 description that you've written here?

5 A. So ultimately, somebody left a restrictive
6 housing area and was not strip searched.

7 Q. Right. Well, I'm talking about where it
8 says, under noncompliance, colon, on January 22nd, 2020,
9 segregation Inmate 497278 was able to unsecure his
10 segregation cell door and was able to walk out of his
11 segregation pod with another inmate worker. These
12 inmate workers were not strip searched prior to leaving
13 the segregation unit on January 22nd of 2020. Do you
14 see that?

15 A. I do.

16 Q. Do you recall this incident, a little over a
17 year ago?

18 A. I do.

19 Q. Can you provide any more information about
20 what occurred?

21 A. The main part I recall is an inmate was able
22 to tamper with his lock and exit the unit with an inmate
23 worker. And they weren't strip searched. And they were
24 allowed to go back into another area of the prison in
25 another housing.

1 Q. And you said earlier that an individual might
2 be in segregation because he has a higher security level
3 than the prison typically handles or because he is
4 awaiting disciplinary action, right?

5 A. Correct.

6 Q. Do you see that the next report we have here
7 is dated August 4th of 2020?

8 A. Yes.

9 Q. And do you see that it again concerns
10 Essential Search Item 3 in the contract monitoring
11 instrument?

12 A. Yes.

13 Q. And this is the same one we discussed a
14 couple of times, right, where inmates are moved and cell
15 searches for those cells are not entered into TOMIS?

16 A. Yes.

17 Q. Do you see that the next document we have is
18 dated February 1st of 2021?

19 A. I do.

20 Q. And it covers the time period from July 1st
21 of 2020 to December 31st of 2020?

22 A. Yes.

23 Q. And it's discussing safety and emergency
24 procedures and monthly inspection reports. What kind of
25 inspections are we talking about in this noncompliance

1 report?

2 A. Building audits.

3 Q. Did anything in this type of monthly
4 inspection that you're handling here have to do with
5 security or locks or safety or anything like that?

6 A. It's a welfare check of the building, so this
7 isn't pertaining to documenting searches in TOMIS, but
8 it is pertaining to what the safety manager audits. So
9 intercoms, light fixtures, seeing that the building is
10 running appropriately.

11 Q. So intercoms and light fixtures could impact
12 safety, but more indirectly than, say, a lock, right?

13 A. Yes.

14 Q. Do you see that we have a document dated
15 February 1st of 2021?

16 A. Yes, I do.

17 Q. Do you see that this one is also covering
18 July through December of 2020?

19 A. Yes.

20 Q. And this one covers searches again, Essential
21 Item 3 on the contract monitoring instrument?

22 A. Yes.

23 Q. And here, inmates are being moved and cell
24 searches are not performed, or at least not entered as
25 required?

1 A. Yes, that's a finding, that they've not been
2 entered into TOMIS.

3 Q. And for this one, does it look like there is
4 less than 50 percent compliance?

5 A. Yes.

6 Q. And here, if we go to the document that is
7 Bates stamped TDOC 002371 and dated February 1st of
8 2021, do you see that we have a noncompliance report
9 concerning monitoring instruments, Facility and Property
10 Item2?

11 A. Yes.

12 Q. And do you see that it covers October through
13 December of 2020?

14 A. Yes.

15 Q. Now, this is fairly recently, right?

16 A. It is.

17 Q. And here it's noted that the applicable
18 policy being discussed is TDOC Policy 502.04, which
19 states: Cell inspections will be conducted daily,
20 Monday through Friday, starting at 9:00 a.m. Each
21 inmate shall be responsible for keeping his, slash, her
22 own living area clean and in good order as dictated by
23 each institution. Do you see that?

24 A. I do.

25 Q. And do you see that the noncompliance issue

1 is described as: On November 9th, 2020, TTCC was
2 audited and discovered daily cell inspections were not
3 being completed as required by the standard?

4 A. I do.

5 Q. And do you see that the second paragraph
6 there states: An e-mail was sent by the contract
7 monitor to the facility requesting a time to review
8 these inspections to ensure they occur daily?

9 A. I do.

10 Q. Did you send the e-mail that is mentioned
11 there?

12 A. I did.

13 Q. Do you see that the second sentence of the
14 second paragraph states: As of December 18th, 2020,
15 daily cell inspections were not observed and
16 documentation has been provided to the contract monitor
17 to determine if this requirement is being performed?

18 A. Yes, I see that.

19 Q. Did it concern you last winter that these
20 cell inspections weren't being done?

21 MR. WELBORN: Object to the form.

22 MS. HASHEMIAN: Object to the form.

23 THE WITNESS: It was obvious that that was an
24 area they needed to improve on. That's why I submitted
25 the finding.

1 BY MS. MAPLES:

2 Q. Well, but did it concern you?

3 MS. HASHEMIAN: Object to the form.

4 THE WITNESS: It did not concern me.

5 BY MS. MAPLES:

6 Q. Why not?

7 A. Because I know they still had staff walking
8 through the unit. And this is the only time period that
9 I can recall. It was right in the middle of COVID when
10 we really didn't want everybody -- when you do cell
11 inspection, you have to be out right in front of your
12 cell. You're talking about 120 inmates that are now
13 going to be out in the middle of the day room together
14 with staff walking right by them. So there were
15 significant staff that were out at that point with this
16 going on, as well as inmates that were needing -- that
17 were isolated. So this was a period where the facility
18 wasn't meeting that standard. So we did document it.

19 Q. Right. It sounds, though, like you're saying
20 that for over a month, cell inspections were not
21 occurring?

22 MS. HASHEMIAN: Object to the form.

23 THE WITNESS: Yes, or we were not able to see
24 in our audits in those buildings when we walked through
25 them that they were occurring.

1 BY MS. MAPLES:

2 Q. But you weren't concerned?

3 MS. HASHEMIAN: Object to the form.

4 THE WITNESS: No, I was not concerned.

5 BY MS. MAPLES:

6 Q. Do you recall any lockdowns that occurred in
7 early December of 2020?

8 A. I don't recall.

9 Q. Do you recall any incidents in which inmates
10 were transported to the hospital in early December of
11 2020?

12 A. I don't, but I know inmates went out to the
13 hospital at some point in December of 2020.

14 Q. Okay, what were inmates going to the hospital
15 for?

16 A. I have no clue what the specifics would be,
17 but inmates would go out to the hospital every week. I
18 don't think we've ever had a week where we've not had an
19 inmate go out to the hospital for either some kind of
20 medical appointment or something.

21 Q. Was there some kind of gang attack or
22 anything in December of 2020, around the time that these
23 cell searches weren't being performed?

24 A. I don't recall.

25 Q. You don't recall if the Crips and the Vice

1 Lords all attacked each other in one of the units in
2 December of 2020, five months ago?

3 MS. HASHEMIAN: Object to the form.

4 THE WITNESS: I know we've had Vice Lord,
5 Blood and Crip related incidents all in the last year.

6 BY MS. MAPLES:

7 Q. But you don't recall if one of them occurred
8 in December of 2020?

9 MS. HASHEMIAN: Object to the form.

10 THE WITNESS: I don't.

11 BY MS. MAPLES:

12 Q. Does Trousdale track which inmates have gang
13 affiliations?

14 A. We do.

15 Q. And what percentages of Trousdale inmates
16 have gang affiliations?

17 A. Around 35.

18 Q. Thirty-five percent?

19 A. Yes.

20 Q. Has it ever been higher than that?

21 A. I believe a little higher. I don't think
22 it's ever gotten past 40.

23 Q. So Trousdale has never had above, say, 50
24 percent of inmates with gang affiliations?

25 A. Not confirmed on TOMIS that I have ever seen

1 in any report, no.

2 Q. So Trousdale hasn't reduced the number of
3 inmates with known gang affiliations due to criticism
4 that Trousdale is particularly beset by violence?

5 MS. HASHEMIAN: Object to the form.

6 THE WITNESS: What was the question?

7 BY MS. MAPLES:

8 Q. I'm asking if Trousdale has reduced the
9 number of inmates with known gang affiliations in
10 response to criticism from the media, from various
11 government officials about the level of gang activity
12 inside the facility?

13 MR. WELBORN: Object to the form.

14 MS. HASHEMIAN: Object to the form.

15 THE WITNESS: I can tell you, we have -- our
16 numbers of confirmed gang members are comparable with
17 Morgan County, Hardeman, Whiteville, South Central,
18 other big general population prisons in Tennessee.

19 BY MS. MAPLES:

20 Q. Well, what I'm asking is, has Trousdale ever
21 reduced the number of inmates with known gang
22 affiliations in response to criticism from various
23 outside sources?

24 A. No, we have not.

25 Q. Okay.

1 A. I thought you said refuted, and I was
2 confused with your question. I just heard reduced and
3 that made sense to me.

4 Q. Okay. Do you know how many homicides there
5 have been at Trousdale since January of 2020?

6 A. I don't know the exact number. I know of two
7 for sure.

8 Q. What are the names of the two individuals?

9 A. The most recent -- are you asking the ones
10 who committed the act or the victim?

11 Q. The victim.

12 A. The most recent would be -- I know the
13 suspects because I do the disciplinary hearings. But I
14 don't have -- there were two in the last six, seven
15 months and I know one of the victims. I believe his
16 last name is Adams.

17 Q. Are you referring to Aaron Blake Adams?

18 A. I believe so.

19 Q. Was that around December 17th of 2020?

20 A. That sounds about right, yes.

21 Q. So Aaron Blake Adams died, you know, as a
22 result of inmate violence during the time that, if we
23 look at the document in front of you, CoreCivic was not
24 conducting cell checks?

25 MR. WELBORN: Object to the form.

1 MS. HASHEMIAN: Object to the form.

2 THE WITNESS: They were conducting checks of
3 the inmates in their cells. They were not -- cell
4 inspection is a separate -- a totally separate item than
5 the actual cell checks. Officers were still conducting
6 irregular checks. This item is about cell inspection
7 where the unit manager and unit team would take the
8 inmates out of their cells and they would check the
9 cells to make sure that the lights work and the locks
10 are performing. But in this specific incident, this was
11 in a restrictive housing unit where we would never take
12 the inmates out to do cell inspection.

13 BY MS. MAPLES:

14 Q. What restricted housing unit was Mr. Adams
15 in?

16 A. I believe he was in alpha echo. He was one
17 of our close custody inmates.

18 Q. When you say close custody, do you mean
19 protective custody?

20 A. No, not at all. Close custody is the name of
21 his custody level. And that is --

22 Q. What -- I'm sorry, I was about to ask what
23 close custody means and I think you were about to tell
24 me and we talked over each other. So go ahead.

25 A. It means that his points are 10 or higher on

1 the first four items of the reclass summary or 17 points
2 or higher. And ultimately, that means he is a higher
3 level security inmate than what the facility can handle.
4 And that typically means that you have a recent
5 assaultive behavior inside the prison. So he would be
6 on close custody pending transfer to a close custody
7 prison.

8 Q. Did you say a previous assault within the
9 facility?

10 A. Yes, the majority -- almost all of our close
11 custody inmates have an assault inside the prison that
12 they have done in the last 18 months. And that bumps
13 their custody level to where they're too high custody to
14 be walking around general population.

15 Q. So you're saying he got assaulted in the
16 prison?

17 A. No, he did an assault in the prison.

18 Q. He did an assault?

19 A. Correct.

20 Q. Okay. And then he got murdered?

21 A. I believe he assaulted a staff member that
22 wound him up on close custody. And his cellmate was
23 also close custody for assaulting somebody inside the
24 prison. So they were both considered high custody level
25 inmates due to violent acts on others inside the prison.

1 Q. You mentioned another death. Does the name
2 Terry Deshawn Childress sound right?

3 A. I don't know. I know who the -- I believe I
4 know who the suspect was.

5 Q. Was that around February 24th of 2021?

6 A. Yes.

7 Q. What occurred with that incident?

8 A. That was another restrictive housing incident
9 with two cellmates.

10 Q. Can you say more about that, what happened?

11 A. I think the case is still pending, but I know
12 it appeared --

13 Q. Well, I am not asking anything about a
14 pending investigation. So I don't want you to feel like
15 you need to get into that, okay? Are those the only two
16 deaths that have occurred related to assault by other
17 inmates since January 2020 that you are aware of?

18 A. Those are the recent ones that I am aware of.

19 Q. Are drugs an issue inside the prison?

20 A. They are. They are inside the prison.
21 Unfortunately, that's a problem at several different
22 facilities.

23 Q. How available would you say drugs are at
24 Trousdale?

25 A. If you have money, they're definitely

1 available.

2 Q. So if I were an inmate and I had money and I
3 wanted to procure drugs, could I get them the same day?

4 A. It's likely. I mean, they've gone on spurts
5 where the facility's done things, mass searches where
6 they're not available the same day. But then there are
7 other days that they are available.

8 Q. So you say it's likely that I would be able
9 to get them the same day?

10 A. Yes, it's likely, if that was your goal.

11 Q. And I use the word drugs, but do you
12 understand that to include meth, cocaine, fentanyl and
13 heroin?

14 A. Yeah, I mean, those would be some of the
15 drugs that we have confiscated from inmates.

16 Q. Which one do you perceive to be the biggest
17 problem right now?

18 A. I would say methamphetamines would be the
19 most dangerous because of how unpredictable people can
20 be while they're on it.

21 Q. So you're saying that the issue with meth is
22 not that it perhaps poses as large a risk of overdose
23 as, say, fentanyl or heroin, but that it makes inmates
24 much more unpredictable and possibly more violent; is
25 that right?

1 A. Yes. The majority of our overdoses, not just
2 here, at other facilities, tends to be opiate related.
3 But the methamphetamine use makes our offenders quite a
4 bit more unpredictable and dangerous when they're under
5 the influence of that substance.

6 Q. How frequently are there overdoses at
7 Trousdale?

8 A. It varies. I mean, we go sometimes where
9 there might be three or four weeks without one, then we
10 may have one or two in the same week.

11 Q. Have you all ever had two overdoses in a
12 night?

13 A. We have.

14 Q. Do you know if there are any deaths, inmate
15 deaths from 2020 that are still categorized as
16 undetermined?

17 A. That, I don't know.

18 Q. How would I figure out that information?

19 A. I know our agency has a process when we get
20 the autopsy results back. We would then update what is
21 in our state database, in TOMIS. And that happens at a
22 central office level.

23 Q. If you were to go in to TOMIS, would you be
24 able to quickly determine how many incidents of a
25 certain incident type have occurred over a given time

1 period?

2 A. No, you would not. You would have to
3 physically count them up yourself.

4 Q. Well, what if you wanted to just find all of
5 the incidents of a certain incident type at Trousdale
6 for a given time period and just print them all out, is
7 that something that you could do through TOMIS?

8 A. No, you would literally have to print out
9 every day's worth of incidents.

10 Q. So you couldn't isolate it just by incident
11 type?

12 A. No, you can isolate it by date. And so if
13 you put down December 2nd, 2019, it would take you to
14 all of the incidents from that date.

15 Q. Is there an easy way, I guess is what I'm
16 asking, to determine, for example, all of the situations
17 in which an inmate has attacked a staff member?

18 A. There's not an easy way to pull it off TOMIS,
19 no.

20 Q. Do you all have situations in which inmates
21 attack staff members often?

22 A. It happens. I mean, similar to the
23 overdoses. We might not have a staff assault for three
24 or four weeks and we might get two or three in one week
25 all together.

1 Q. Do you have an opinion as to how such a large
2 volume of drugs seem to enter the facility?

3 A. I mean, I know how drugs get into a prison.
4 I mean, we've arrested several visitors and employees
5 for bringing narcotics into a penal facility.

6 Q. Are those the only ways that, you know, drugs
7 can get into a facility?

8 A. There's a couple of different ways besides
9 the visitors and employees. Vehicles that go through
10 sally port to deliver food, that deliver supplies into
11 the prison. As well as drones and throw-overs, where
12 you have individuals who run up near the prison and
13 deploy contraband over into the prison. Those are the
14 main five ways that they come through.

15 Q. What are the different things that CoreCivic
16 can do at Trousdale to kind of stem the flow of drugs
17 into the prison?

18 A. They do what all of our facilities do in
19 Tennessee to combat the contraband problem. And that's
20 -- they have a canine officer and narcotics dog assigned
21 to the prison that randomly inspect visitors and staff
22 as they come in. We have active metal detectors and pat
23 search everybody who comes into the prison, including
24 people like the warden and I get pat searched every day.

25 And we do random searches of the prison where

1 we lock the unit down and search every area of that --
2 in that building. We do vehicle searches where we
3 randomly search visitors' and employees' vehicles as
4 well as their person coming in. So we do everything we
5 can to attempt to combat the contraband problem.

6 Q. So cell searches are one of the ways that you
7 all can address the drug problem in Trousdale?

8 A. They are. Our ultimate goal is to stop the
9 source from coming in. So that's why, like I said, we
10 have a full-time canine officer and canine dog. And we
11 do things like random vehicle searches and barrier
12 screens of employees and visitors to try to stop it at
13 the source.

14 Q. Have you all ever had an inmate attack the
15 narcotics dog?

16 A. No, not that I am aware of. Not this dog.

17 Q. What about drug screening the inmates, is
18 that something that is used to kind of track drugs
19 within the prison?

20 A. It is.

21 Q. I'm going to show you another collective
22 exhibit. Do you see that the document in front of you
23 is dated January 31st of 2019?

24 A. I do.

25 Q. And do you see that audit scope is drug

1 testing, October 1st, 2018 through December 31st, 2018?

2 A. I do.

3 Q. What is the noncompliance item here?

4 A. This is dealing with our inmates that are
5 considered to be on our hot list.

6 Q. What is a hot list?

7 A. It's inmates who have tested positive or
8 refused a drug screen. They get tested for three
9 consecutive months.

10 Q. In this noncompliance report, what events led
11 to the noncompliance finding?

12 A. Pulling a sample of inmates that were
13 supposed to be tested for three consecutive months
14 through our state database in TOMIS and observing that
15 seven of the ten didn't have those documents in TOMIS.

16 Q. So concerning drug testing procedures Item 3G
17 for this audit period, CoreCivic was 30 percent
18 compliant?

19 A. Yes, for this item, that's correct.

20 Q. Do you see that the next page is dated July
21 15, 2019?

22 A. I do.

23 Q. And do you see that this one is actually
24 listed as count procedures for April 1st, 2019 through
25 June 30th of 2019?

1 A. I do. It looks like a typo.

2 Q. Okay, gotcha. So this one is drug testing
3 procedures again, it's not count procedures?

4 A. Yes, correct.

5 Q. Do you see that, again, there's a repeat
6 noncompliance for inmates who are positive on a drug
7 screen and should be retested for a period of three
8 consecutive months?

9 A. Yes.

10 Q. And can you describe the facts that led to
11 this noncompliance finding?

12 A. We just pulled a random sample of inmates who
13 have refused or tested positive for that monitoring
14 period. And then we monitor to see if they got the
15 three additional tests they're supposed to receive.

16 Q. So I just had to count them. It looks like
17 of the inmates you tested, eight of them were not
18 retested; is that right?

19 A. Correct.

20 Q. How many were in the sample? Was it 10
21 again?

22 A. I honestly don't recall. I mean, it
23 obviously was enough where it wasn't going to meet that
24 threshold of compliance to turn into a finding.

25 Q. Well, let's scroll back up. Because here, I

1 mean, we have the monitoring instruments drug testing
2 procedures Item 3G, right?

3 A. Yes.

4 Q. So does that contract monitoring item specify
5 how many inmates you should audit?

6 A. I don't believe it does.

7 Q. Okay. Well, you used 10 here, right?

8 A. Correct.

9 Q. Is it likely that you also used 10 for the --
10 one of the subsequent audits?

11 A. It's likely 10, maximum 20. But likely 10.

12 Q. And if it is 10, then CoreCivic is 20 percent
13 in compliance with drug testing procedures, 3G?

14 A. For that item, yes.

15 Q. And then we're going to scroll down. Do you
16 see that we have another report and it has the same
17 date, July 31st of 2019? Do you see that?

18 A. I do.

19 Q. And do you see that it's got the same typo
20 there beside audit scope? It says count procedures, but
21 it's the same time period as the previous document,
22 April 1st, 2019 through June 30th of 2019.

23 A. Yes, yeah, that is. It's a drug testing
24 instrument. I'm looking at the monitoring instrument
25 and it's a typo.

1 Q. Do you see that this one isn't concerning 3G,
2 this one's concerning monitoring Instrument 1A?

3 A. Yes.

4 Q. What are the events that led to the
5 noncompliance finding here?

6 A. In this item, it's to ensure that they are
7 testing a random sample of inmates.

8 Q. Okay, and what did you find occurred instead
9 of that?

10 A. That they weren't within compliance to
11 testing 2.5 percent.

12 Q. If we look under noncompliance issue, it
13 states: TTCC could not produce any documentation of the
14 randomly tested inmates for the month of October 2019.
15 Do you see that?

16 A. I mean, I'm looking at -- it says March had
17 24, April had 35.

18 Q. Oh, apologies, I was looking at a different
19 document. So explain what you're saying is on this one.

20 A. Okay. So I was going to say, I don't see
21 that yet. But what I'm seeing on this one is that
22 they're just not meeting the standard of 2.5 percent.
23 If we had 2500 inmates here, it would be more than what
24 they tested to meet that standard.

25 Q. Now, if we go down to the next one, if we

1 look at the page that's, again, TDOC 002256, do you see
2 that the date is December 31st of 2019?

3 A. I do.

4 Q. And do you see that this one concerns drug
5 testing procedures 1A?

6 A. Yes.

7 Q. Do you see that this is the one I was
8 referring to a moment ago, that Trousdale could not
9 produce any documentation of randomly selected inmates
10 for the month of October 2019?

11 A. Correct.

12 Q. Was there an explanation as to why there were
13 no records for a month?

14 A. I know they had some recent turnover in the
15 drug testing coordinator. And I believe for that month,
16 there was a gap between drug testing coordinators.

17 Q. Do you see that there is a Noncompliance Item
18 2?

19 A. Yes.

20 Q. And do you see that CoreCivic has failed to
21 retest inmates that have tested positive for drugs in
22 the past for a period of three consecutive months?

23 A. Yes.

24 Q. And do you see the next document is one with
25 a Bates stamp TDOC 001692 and dated August 4th of 2020?

1 A. I do.

2 Q. And do you see that this one concerns drug
3 testing and substance abuse treatment?

4 A. Yes.

5 Q. Do you see that it involves certain inmates
6 refusing drug screening and not being issued a
7 disciplinary action?

8 A. You will have to scroll down. Yes, that's
9 good.

10 Q. Do you see that on the next page,
11 Noncompliance Item 2 indicates that all positive lab
12 tests did not result in issuance of a disciplinary
13 report?

14 A. Yes.

15 Q. Is this audit of drug testing and substance
16 abuse treatment something that you do biannually?

17 A. Yeah, it is a biannual audit.

18 Q. And do you see if we scroll down to the next
19 report, which is dated February 25th, 2021, it covers
20 the period from July through December of 2020?

21 A. Yes.

22 Q. Do you see that, again, it addresses drug
23 testing and substance abuse?

24 A. I do.

25 Q. And if you could, just describe the events

1 that led to the noncompliance finding here.

2 A. So here, you've got inmates that tested
3 positive on a drug screen, but didn't get a disciplinary
4 report.

5 Q. And if we could look at Noncompliance Item 2,
6 what are the events that led to this noncompliance
7 finding?

8 A. This would be for inmates that would have
9 indicated a three-month follow-up testing and didn't
10 receive that. So that finding would be for inmates that
11 were supposed to get follow-up drug testing, but did not
12 receive follow-up or it was not documented in TOMIS.

13 MR. WELBORN: Can we take a break?

14 MS. MAPLES: Sure.

15 MR. WELBORN: About five minutes, ten
16 minutes, doesn't matter to me.

17 (Recess observed.)

18 MS. MAPLES: Mr. Brun, what we're going to
19 do, we just talked about it. We are going to make the
20 announcements that we're concluding. Due to a couple of
21 scheduling conflicts and a bit of a late start today
22 with the second deposition, we're going to conclude for
23 now, holding this deposition only to be continued at a
24 later date to be decided by the parties. That's all.

25 FURTHER DEPONENT SAITH NOT.

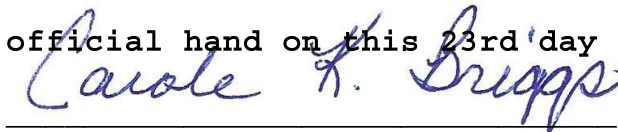
CERTIFICATE

STATE OF TENNESSEE)
) SS.
COUNTY OF DAVIDSON)

I, CAROLE K. BRIGGS, Licensed Court Reporter
within and for the State of Tennessee, do hereby certify
that the above deposition was reported by me and that
the foregoing pages of the transcript is a true and
accurate record to the best of my knowledge, skills, and
ability.

I further certify that I am not a relative,
counsel or attorney of either party nor employed by any
of the parties in this case or otherwise interested in
the event of this action.

IN WITNESS WHEREOF, I have hereunto affixed my
official hand on this 23rd day of April 2021.



CAROLE K. BRIGGS
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